Comments for Draft Revisions (Not Applicable to Directives; Refer to Directive Management Officer for Directive Comment Format)

For detailed instructions on how to fill out the columns below, please see the Instructions sheet.

Comments Submitted By: Moin Abulhosn										
	Organizatio	n:	AIR-130 (AC 20-149B)							
	Phone:		202-267-857	71						
Comr	nents Submitte	d By:	Seatlle ACO							
	nization:		ANM-100S							
Phon			(425) 917-64	100						
e :										
#	Document Name	Page Number	Paragraph Number	Referenced Text	Comment/Rationale or Question	Proposed Resolution	Comment Type (Conceptual, Editorial, or Format)			
1	AC 20-149B	9	9.2.3	If used, red should be associated with conditions that represent serious near-term or potential threats to safety.	Red is considered a threat to safety and should have a clear indication to flight crew.	If used, red should be associated with conditions that represent serious near-term or potential threats to safety. In addition, red should not be overlaid or obscured by other symbols.		Non Concur. The proposed added wording is not a MOPS requirement, nor is this directly addressed in any of the xx.1322 regulations. The referenced ACs in the Note section of para 9.2.7 on page 10 of the AC do cover possible overlays and obstruction of alerting information. If needed, we will present this proposal for consideration in a future revision of the MOPS.		
2	2 AC 20-149B	9	10	Perform electromagnetic compatibility tests to demonstrate that the FIS-B avionics equipment does not adversely affect other aircraft systems, including required radio systems.		Perform electromagnetic compatibility tests to demonstrate that the FIS-B avionics equipment is not adversely affected, and does not adversely affect other aircraft systems, including required radio systems.	Conceptual	Concur. Changed the wording in the section to reflect the comment.		
	AC 20-149B	9	10	The FAA recommends doing radio frequency (RF) emissions tests on the FIS B avionics equipment using AC 21-16G. Section 21.0 of RTCA/DO-160 versions D, E, F, and G contains	Different versions are confusing, recommend using only the latest one.	The FAA recommends doing radio frequency (RF) emissions tests on the FIS B avionics equipment using AC 21-16G. Section 21.0 of RTCA/DO-160 versions D, E, F, and G contains the appropriate emission of RF energy test procedures.	Editorial	Non concur. Per AC 21-16G, DO-160 version D (with Changes 1 through 3 incorporated), E, F, or G are all acceptable means of compliance for this test. However, consistent with AC 21-16G, we are adding the parenthetical requirement for Changes 1		

the appropriate emission of RF

energy test procedures.

through 3 to be incorporated in Version D.

Comments Submitted By:		Moin Abulh	Moin Abulhosn						
Organization:		AIR-130 (AC 20-149B)							
Phone:		202-267-85	202-267-8571						
4 AC No: 20-149B	3	5 & 6	Definition of key terms. BACKGROUND	Question - Is FIS planned or envisioned to be functional over the ADS-B 1090 (Mode S) systems and frequencies? If so, that should be more definitively explained and discussed within this document in the Definitions and Background Sections.		Non concur. This AC is for UAT and Commercial providers not Interoperable with the SBS provider only. FIS-B is not provided over 1090ES.			
5 AC No: 20-149B	11	13.2	Flight Tests	Add the following sub-paragraph 13.2.3 - Evaluate all reasonable combinations of control settings and operating modes for the FIS-B system and aircraft safety-related and required electrical and electronic systems in flight. With FIS-B equipment energized in flight, operate other electrically operated equipment and systems on the aircraft to demonstrate electromagnetic compatibility. Evaluate FIS-B operation and function during possible degraded electrical configurations.		Non concur. Electromagnetic Interference is discussed in Secton 10. Since FIS-B is a non-required system and its loss or failure is minor, it is not the intent of this AC to require a flight test of every FIS-B installation. Rather, as set forth in Section 13.2.1, an inflight EMC evaluation is only required if EMC cannot be adequately demonstrated during ground tests. The ground tests specified in Section 13.1 are considered adequate to demonstrate the basic function, operation and integration of the FIS-B equipment. Section 13.2.2 of the AC provides for flight evaluation of failure conditions that cannot be tested on the ground, as necessary.			

	For detailed instructions on how to fill out the columns below, please see the Instructions sheet.												
Co	mments Submi	itted By:	Moin Abulho	Moin Abulhosn									
	Organizatio	n:	AIR-130 (AC 20-149B)										
	Phone:		202-267-857	202-267-8571									
Co	mments Submi	itted By:	Transport St	andards Staff									
	Organizatio	n:	ANM-111										
	Phone:	1	425-227-211				1 -						
#	Document Name	Page Number	Paragraph Number	Referenced Text	Comment/Rationale or Question	Proposed Resolution	Comment Type (Conceptual, Editorial, or Format)	Disposition/Response to Comment					
	AC 20-149B	2 & 10	4.1 & 12.3	AC 25.1419-1A	AC 25-28, "Compliance of Transport Category Airplanes with Certification Requirements for Flight in Icing Conditions," dated October 27, 2014 cancels AC 25.1419-1A.	Change references to AC 25-28.	Editorial	Concur. References to AC 25.1419-1A replaced with AC 25-28.					
Comr	nanta Cubmitta	ad Dva	ACE										
	nents Submitte nization:	ей Бу:	Small Airplane	Directorate									
O i gai	Phone:												
#	Document Name	Page Number	Paragraph Number	Referenced Text	Comment/Rationale or Question	Proposed Resolution	Comment Type (Conceptual, Editorial, or Format)	Disposition/Response to Comment					
		8		To ensure compatibility with existing Title 14 of the Code of Federal Regulations (14 CFR) part 25 transport airplane displays and to ensure displays maintain their effectiveness across a wide variety of functions and applications, the applicant should apply the following principles when determining what, if any, features of FIS-B displays should be coded red, amber (yellow), and green. Use the following part 25 guidance instead of the color guidance found in RTCA/DO-267A, section 3.8 and table 3-2:		The resolution is dependent upon the response to the questions asked. If only applies to Part 25, then leave it alone. If it applies to all users of FIS-B, then remove references to Part 25.		Concur. Section 9.2 changed. Actually Part 23 regulations refers you to Part 25 regulations. This AC will refer in generality to all aircrafts.					

Comments Submitted By:	Moin Abulhosn							
Organization:	AIR-130 (AC 20-149B)							
Phone:	02-267-8571							
9	place of the color guidance in	This is confusing. Section 9.2 just laid out how to apply colors in lieu of DO-267A, section 3.8 and table 3-2, and now you are stating color guidance in the listed documents should be used in lieu of DO-267A, section 3.8 and table 3-2. What color scheme should be followed?	Make sure it is clear to the reader what color policies should be used.	Concur. Added reference to "Section 9.2 of this AC" to this section.				
1	1.1 "This AC describes an acceptable means, but not the only means, to gain airworthiness approval"	1		Non concur. Standard template language plus Plain Language specified by the Administrator's Order.				

Comments Submitted By:	Moin Abulho	Moin Abulhosn AIR-130 (AC 20-149B) 202-267-8571							
Organization:	AIR-130 (AC 2								
Phone:	202-267-857								
	9.2 through 9.2.7	See previous comments from ACE. Additionally this appears to be written for part 25 and need to be clarified for part 23.	that the note is in 9.2	9.2 Guidance found in AC 23.1311-1C or AC 25-11B, and AC 25.1322-1, should be used in place of the color guidance in RTCA/DO-267A, section 3.8 and table 3-2. For part 25 transport airplanes, to ensure compatibility with existing displays and to ensure displays maintain their	Concur. Changed para to talk to all aircraft types associated, in general.				
5 and 8	Note and Note 1	This indicates that FIS-B is an approved source for TFR information.	I am not sure and could not confirm but believe that FIS-B is not an approved source of TFRs. FIS-B is not an approved source for NOTAMs and TFRs are a NOTAM.	This should be checked.	Non Concur. Checked for validity and TFR is an approved data type.				
10	0 12	As a 20 series AC I think this covers Light Sport Aircraft. If so there needs to be an additional paragraph in 12.		12.4 Alterations made to LSA aircraft must be evaluated relative to the requirements of the applicable design and production consensus standards and verify that the altered aircraft still meets the standards subsequent to the alteration.	Non concur. Standard template language plus Plain Language specified by the Administrator's Order. However, we will identify this as a potential needed template change.				

Comments Submitted By:			Moin Abulho	Moin Abulhosn								
	Organizatio	n:	AIR-130 (AC 20-149B)									
	Phone:		202-267-8571									
Com	ments Submitte	ed By:	Kevin Campbell, Kent Lund, Kyle Smith, Jose Flores									
	nization:		ACE-117W, ACE-119W									
Phor			316-946-4163/ 4194/ 4170 respectively									
#	Document Name	Page Number	Paragraph Number	Referenced Text	Comment/Rationale or Question	Proposed Resolution	Comment Type (Conceptual, Editorial, or Format)	·				
1	AC20-149B	8	9.2.1	Design Considerations	Color assignment should be identical to 14 CFR part XX.1322.	Instead of paraphrasing XX.1322 the document should simply reference XX.1322.	Conceptual	Non concur. The description in 9.2.1 is appropriate to the AC and to the regulations.				
2	AC20-149B	11	14.1	AFMS wording	On page 8, the document describes Class 1 and Class 2 equipment. The AFMS example appears to present a Class 2 AFMS solution. In addition, the AFMS should advise the aircrew if they have approved data or not.	Revise the wording to include if the system is Class 1 or Class 2 per AC 20-149B or include a statement that the data is or is not FAA approved.	Conceptual	Non concur. The AFMS wording in the AC is not example wording, it is required wording for both Class 1 and Class 2 equipment. TSO-C157b also contains additional required language for the equipment operating manual, which identifies what data is FAA-approved for Class 1 equipment (and which specifically excludes NOTAMS). No data is FAA-approved on Class 2 equipment.				
3	AC20-149B	5	6.1, Note, 3rd line		1.) Why is "TFR" not listed as a bullet above?2.) Why is "SPECI" bullet above not listed in this sentence?	1.) Include "TFR" in the bullets, as part of the FIS-B data package. 2.) Add "SPECI" (2nd bullet) to the list of FIS-B data listed in this sentence, if applicable.	Conceptual	Concur. Added TFR to the list of Products. SPECI is part of METAR, changed the referred Note in the AC to reflect that METAR includes SPECI.				
4	AC20-149B	5	6.1, Note, 4th and 5th lines		is not an FAA-approved source for NOTAMS". However, NOTAMS	Include an asterisk and associated footnote adjacent to the NOTAM bullet stating this data is not FAA-approved. A brief explanation of why this data is not FAA-approved would be beneficial.	·	Non Concur. The "Note" must be read. Putting an * for the NOTAM and not the others might lead the reader to skip the "Note". Additionally, the equipment operating manual and/or A/RFMS will specify what types of data, if any, are FAA-approved. The required equipment operating manual language in TSO-C157b specifically excludes NOTAMs.				
5	AC20-149B	6	6.3, 4th line		"(1a)" is not clear in this context.	Suggest changing "(1a)" to "step 1a as shown in Figure 1 below".	Conceptual	Concur. Changed to "step 1a below".				
6	AC20-149B	6	6.3, 6th line		"(2a)" is not clear in this context.	Suggest changing "(2a)" to "step 2a as shown in Figure 1 below".	Conceptual	Concur. Changed to "step 2a below".				
7	AC20-149B	6	6.3, 7th line		"(3a)" is not clear in this context.	Suggest changing "(3a)" to "step 3a as shown in Figure 1 below". Note: What is the significance of the "a" following steps 1a, 2a, and 3a? It implies there may be "b" steps listed elsewhere.	Conceptual	Concur. Changed to "step 3a below".				

Con	nments Submi	tted By:	Moin Abulhosn							
	Organizatio	n:	AIR-130 (AC 20-149B) 202-267-8571							
	Phone:									
8	AC20-149B	7	7.2, 1st line	The "air" subnetwork is not depicted in Figure 1.	Suggest adding a representative depiction of an "air" subnetwork to Figure 1.	Conceptual	Partially concur. Although dissemination of FIS-B via airborne relay may be technically possible, FIS-B is currently only provided through ground- and space-based transmitters. Removed "air" from paragraph 7.2 to align with Figure 1.			
9	AC20-149B	7	7.3, 1st line	This line addresses "ground end systems".	Please clarify or give an example of "ground end systems".	Conceptual	Concur. Changed "ground end systems" to "ground and spaceborne transmitters".			
10	AC20-149B	8	8.2, Note 1, 3rd and 4th lines	These lines state "FIS-B Class 1 equipment uplink is not an FAA-approved source for NOTAMs". However, NOTAMS are included in the bullets on page 5 and may be construed as "FAA approved" data.		Conceptual	Non concur. See response for comment 4.			
11	AC20-149B	8	9.2, 2nd and 5th lines	These two lines address "part 25".	Please explain why "parts 23, 27, and 29" are excluded from this paragraph.	Conceptual	Partially Concur. Changed para to reflect all parts. BTW, Part 23 reference in the regulation refers you to Part 25, FYI only.			
12	AC20-149B	9	9.2.2, 1st and 2nd lines	These two lines state "although not necessarily identical".	Please clarify what this means, ie different shades, chromaticity, etc?	Conceptual	Partially concur. Although shading, chromaticity, etc. may vary somewhat across different types of displays, the colors red, amber (yellow), and green should maintain their meaning consistent with this section regardless of display type. No change is considered necessary to the wording in this section.			
13	AC20-149B	9	9.2.6	This paragraph is vague.	Does it mean that mixed color information can't be displayed simultaneously or that the same information can't be displayed in different colors? Please clarify.	Conceptual	Partially concur. Color for immediate awareness/action should not be able to be confused with color for Advisory information.			
14	AC20-149B	9	9.2.6, 2nd and 3rd lines	These lines address "color-coded information that is advisory in nature".	Please define the color to be used for "advisory" information.	Conceptual	Non Concur. Check the Note in 9.2.7, it refers to the appropriate ACs for color.			

Cor	Comments Submitted By:		Moin Abulho	oin Abulhosn								
	Organizatio	n:	AIR-130 (AC 2	0-149B)								
	Phone:		202-267-857	1								
15	AC20-149B	9	9.2.7, 2nd line		This line addresses "dated, non-time-critical information" and differentiates it from "time-critical information".	By definition, is "dated" information the same as "non- time-critical" information? This appears to be redundant wording. Or stated differently, can there be "dated, time-critical information"?	- Conceptual	Non concur. Refer to the ACs provided in the "Note" that speaks to this condition.				
16	AC20-149B	12	14.1, 1st line		This line addresses "NOTAMS".	Suggest addressing the FAA-approved vs non-FAA-approved status of NOTAMS, as it pertains to FIS-B Class 1 and 2 data. NOTAM approval status is not clear in this context.	Conceptual	Non concur. TSO-C157b contains required language for the equipment operating manual, which identifies what data is FAA-approved for Class 1 equipment (and which specifically excludes NOTAMS). No data is FAA-approved on Class 2 equipment.				
17	AC20-149B	7	8.1	hazard classification		Suggest adding a paragraph to reference FAA software guidance (AC-115 and RTCA DO-178) when needed.	Conceptual	Non concur. TSO-C157b specifies the required software level and development assurance methods for FIS-B equipment.				
Comn	ents Submitte	ed By:	AIR-500	<u> </u>	•							
Organ	ization		AIR-500									
- 9-1	ization.		AIN-300									
Phone			202-267-859	0								
		Page Number		0 Referenced Text	Comment/Rationale or Question	Proposed Resolution	Comment Type (Conceptual, Editorial, or Format)	Disposition/Response to Comment				
Phone	: Document	_	202-267-859 Paragraph		Question In the last sentence in the fourth bullet item (Flight Information Services [FIS]), the phrase "data"	Proposed Resolution Consider changing "not requiring" to "that do not require, as below: "Additionally, FIS is limited to broadcast data link services that do not require request-reply."	(Conceptual,					

			For detailed instru	octions on how to fill out the col	umns below, please see the Instructions s	heet.				
Comments Submit	ted By:	Moin Abulhos	sn							
Organization):	AIR-130 (AC 20	AIR-130 (AC 20-149B)							
Phone:		202-267-857	1							
3 AC 20-149B	Pg. 4	Par. 5		Transceiver (UAT)" tells what this	Please consider revising the definition of "UAT" to more accurately describe what this device is. As it stands now the definition mostly just describes what it does. For example, something like— "A device that supports"	Clarity/Ease of reading	Concur. Will change the description to read: "A transceiver that operates on the 978 MHz frequency and supports ADS-B, FIS-B and Traffic Information Services-Broadcast (TIS-B) services."			

Cor	Comments Submitted By:		Moin Abulhosn				
	Organizatio	n:	AIR-130 (AC 20-149B)				
	Phone:		202-267-8571				
4	AC 20-149B	Pg. 4	Par. 6 and Universal	The word "below" is unnecessary in the last sentence of this paragraph.	· · · · · · · · · · · · · · · · · · ·	Ease of reading	Non concur. The word "below" helps lead the reader quickly to the proper place in the document. We consider that leaving this word here aids ease of reading, rather than hinders it. No change needed.
5	AC 20-149B	Pg. 4	Par. 6	For clarity, it might make sense to break up the last sentence in this paragraph.	Consider breaking this sentence into two sentences, as below: "To provide for these two methods, this AC recognizes two different FIS-B equipment classes. They are identified in TSO C157b and defined in table 1."	Clarity	Concur. Changed the sentence, plus kept the word below do to its significance.
6	AC 20-149B	Pg. 4	Table 1 and Universal	In the first row of table 1, the word "With" is capitalized. "With" is not normally capitalized in the title case.	Please consider changing "With" to lowercase here and wherever it occurs in title case throughout the document.	Consistency of formatting	Concur. Changed "With" to lower case in the Equipment Name column.
7	AC 20-149B	Pag. 4	Table 1	the document title should be deleted. In the third column of the second	"RTCA, Inc., Document No. RTCA/DO-358, Minimum Operational Performance Standards Also, delete the period at the end of the document title in the second row, as below:	Grammar	Concur. Deleted comma and period.
	AC 20-149B	Pg. 5	Par. 6.1, 8 th and 10 th Bullet Items	Because they are already in parentheses, "CONUS" in the 8th bullet item and "FDC" in the 10th bullet item should be in brackets instead of parentheses.	Replace parentheses around "CONUS" and FDC" with brackets, aas below: "NEXRAD Reflectivity (Continental united States [CONUS]) "Notice to Airmen (NOTAM/Flight Data Center [FDC])	Grammar/ Consistency of formatting	Concur. Changed parentheses to brackets.
	AC 20-149B	Pg. 5	Par. 6.1, Note and Universal	In the first sentence, because it is the first time it is used in the AC, the acronym "PIREP" should be defined.	Please define "PIREP". See formatting example below: "pilot report (PIREPs)" Please correct any other occurrences fo undefined acronyms, if they occur, throughout the document.		Non Concur. The acronym "PIREP" is actually used for the first time in the bulleted list of weather products at the beginning of Paragraph 6.1 and is defined there. Use of the acronym in the Note, although pluralized there ("PIREPs"), is the second use of the acronym. No change needed to text.
	AC 20-149B	Pg. 5	Par. 6.2	The last sentence in this paragraph uses "can" where "may" is appropriate.	Replace "can" with "may", as below: "These service may include-" Rule: " Can" signifies ability or capaciity. "May" requests or grants permission. In negative Example: When you can [not may] get here on time, you may [not can] be excused early.	Grammar	Concur. Changed "can" to "may".

Coi	comments Submitted By:	Moin Abulhosn					
	Organizatio	on:	AIR-130 (AC 20-149B)				
	Phone:		202-267-8571				
	AC 20-149B	Pg. 6	Par. 6.3	In the first sentence, "ground" refers to "data link systems"; therefore, unless it is not correct by FAA standard usage, it should be hyphenated.	If appropriate, add a hyphen to "ground", as below: "Figuere 1 represent a one-way, onon-addressed, FIS-B service that uses either ground-or space- based data link systems."	Grammar	Concur. Added hyphen.
	AC 20-149B	Pg. 7	Par. 7	In the first sentence, "not requiring" is passive voice. It would be clearer if it was changed to "that do not require".	Consider changing "not requiring" to "that do not require", as below: "Portable display systems that do not require design approval are outside the scope of this AC."	Clarity	Concur. Changed to "that do not require"
	AC 20-149B	Pg.	Par. 7.1	The second sentence in this paragraph could be clearer.	Consider adding "Once they gather this information," to the beginning of this sentence and replacing "this information" with "it", as below: "Once they gather this information, FIS providers then process it this information into a format suitable for data link.	Clarity	Concur. Changed to the suggested sentence.
	AC 20-149B	Pg. 7	Par. 7.3	In the first sentence, "ground end" should be hyphenated because it modifies "systems". However, if it is common FAA usage to not hyphenate, leave as is.	Unless it is common FAA usage, consider adding a hyphen to "ground end", as below: "The aircraft FIS-B system receives data from ground-end systems managed by a service provider."	Clarity/Grammar	No longer applicable. Sentence was reworded for better clarity in response to another comment, and the words "ground end" were deleted in this change.
	AC 20-149B	Pg. 7	Par. 8.1 and Universal	be italicized? Because it refers to a hazard classification, it seems like	If it makes sense and goes along with FAA conventions, consider italicizing "minor" as below: "Therefore, the hazard classification should be no greater than minor, provided the flightcrew uses" Please format any similar occurrences as you choose to format this instance throughout the document.	Clarity	Non concur. Italics for hazard classification is not standard in our ACs or TSOs, so we prefer to maintain the norm. We acknowledge the point of the comment. It may be beneficial to discuss such a change to the AC and TSO templates with the template owners.
	AC 20-149B	Pg. 10	Par. 12.1	The word "installation" is redundant.	Please consider striking "installation" after "manufacturer's", as below: "Install the equipment in accordance with the manufacturer's installation instructions."	Ease of Reading	Non concur. "Manufacturer's installation instructions" is a common description for this type of instructions. Manufacturers produce many different types of instructions for their products – e.g. installation, maintenance, operating, etc. Sometimes these go by different names, are consolidated with other types of instructions, or come with other variations. We prefer to maintain the specificity here.

Co	Comments Submitted By:		Moin Abulhosn				
	Organizatio	n:	AIR-130 (AC 20-149B)				
	Phone:		202-267-8571				
	AC 20-149B	Pg. 10	Par. 13.1. 1.		Consider breaking up this sentence by inserting a semicolon after "annunciations" and a comma after the first occurrence of "and" after "annunciations". Also, consider adding "must" after "FIS-B system" and changing "are easily accessible" to "must be easily accessible". See example below— "Ensure the general arrangement and operation of controls, displays, circuit breakers, annunciations; and, any placards for the FIS-B system must have an unobstructed view and must be easily accessible." NOTE: the word "should" could replace "must" in both instances. Please use whichever is most appropriate.	Clarity	Partially concur. Rather than inserting the words "must" and "must be" as suggested, we will make an alternative change by deleting the words "general arrangement and operation of". This will make this sentence a smooth continuation of the lead-in sentence, while maintaining the essence of the intended guidance.
	AC 20-149B	Pg. 10	Par. 13.1.3.	This sentence could be made a little bit clearer if the word "by" was inserted before "ensuring" or if "ensuring" was replaced by "and ensure", whichever better conveys the intended message of the sentence.	Consider adding "by" before "ensuring" or replacing "ensuring" with "and ensure". See 1. "evaluate the system installation by ensuring clear identification, accessibility, and 2. "Evaluate the system installation and ensure clear identification and ensure clear identification and ensure clear identification, accessibility, and visibility during both day and night conditions."	Clarity	Concur. Changed the AC to adopt option 1 in the previous column.
	AC 20-149B	Pg. 12	Par. 14.1 (b)	The addition of "the" after "The system lacks" could make the third sentence in this paragraph a little bit clearer and easier to read.	<u> </u>	Clarity/Ease of Reading	Non Concur. This language, enclosed within quotation marks, is required operating manual language we are specifying for the aircraft/rotorcraft flight manual or flight manual supplement (A/RFM(S)). This language is identical to required equipment operating manual language specified in the associated TSO-C157b. Adding a word within the quotation marks here would make it inconsistent with the required wording in the TSO. We consider the sentence adequately readable as-is. Therefore, to maintain consistency of this required manual language between the AC and the TSO, we decline to make this change.

For detailed instructions on how to fill out the columns below, please see the Instructions sheet. Moin Abulhosn AIR-130 (AC 20-149B) 202-267-8571 ANE-100 & ANE-150 Referenced Text Comment/Rationale or **Proposed Resolution** Disposition/Response to Comment Paragraph **Comment Type** (Conceptual, Question Editorial, or Format) AC 23.1419-20 This Related Publication citation is Reference both the original and change 1 material. Editorial Concur. Added the Original Ac date plus the only really referencing the "change Change 1 date.

28 or the latest AC covering the topic.

Change the date for the AC to the current revision.

Reference AC 29-2C dated

Editorial

Editorial

Editorial

Editorial

Concur. Ac 25-28 is now added as a reference.

ACs are part of the Master doc. No Change

ACs are part of the Master doc. No Change

Non Concur. Date in RGL is 3-3-2008.

1" addendum. Does it also have to

Has this AC has been cancelled by Maybe change to reference 25-

Is the real reference intended here Reference AC AC 27-18 dated

9/30/2008

9/30/2008

reference the original AC as Change 1 has not been

AC 27-18 dated 9/30/2008?

AC 29-2C dated 9/30/2008?

Should this be dated 5/13/2014?

Is the real reference intended here

incorporated?

AC 25-28?

AC 27.1309 and AC 27.1419

AC 29.1309 and AC 29.1419

AC 43.13-28 (B instead of 8)

Comments Submitted By:

Organization: Phone:

Comments Submitted By:

Document

Name

1 AC 20-149B

2 AC 20-149B

3 AC 20-149B

4 AC 20-149B

5 AC 20-149B

Page

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Number

Organization:

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